U.S. DISTRICT COURT WESTERN DISTRICT OF LOUISIANA RECEIVED - SHREVEPORT

SEP n 4 2012

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA

VERSUS JUDGE FOOTE

ALEXANDER DERRICK REECE

DREW T. GREEN

THOMAS WILLIAM MALONE, JR.

BOYD ANTHONY BARROW

JOSHUA ESPINOZA

CURIOUS GOODS. LLC

RICHARD JOSEPH BUSWELL

DANIEL JAMES STANFORD

DANIEL PAUL FRANCIS

BARRY L. DOMINGUE

CRIMINAL NO. 12-CR-00146

MAGISTRATE JUDGE HANNA

MOTION TO SEAL SUPERCEDING INDICTMENT

NOW INTO COURT, comes the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully represents as follows:

I.

On September 4, 2012, a sixteen (16) count Superceding Indictment was returned by the federal grand jury in this matter.

II.

At the time of the presentment of the indictments to the Magistrate Judge, the United States requested that said Indictment be sealed.

111.

Based on the court's policy, the United States hereby moves for an Order of this Honorable Court sealing the Indictment in said matter. The Court's latest policy regarding the unsealing of indictments upon the arrest and initial appearance of the first defendant would jeopardize the arrests of all defendants in said Superceding Indictment.

V.

The United States moves to seal the Indictment until the arrest of all defendants in the Superceding Indictment.

VI.

The United States also moves that all court personnel, including but not limited to: Clerk of Court, U.S. Probation, U.S. Marshal, be instructed <u>not</u> to reveal the existence of said Indictment or the names of the defendants to anyone, specifically including codefendants, the news media and/or defense attorneys for codefendants.¹

WHEREFORE, the United States hereby moves for an Order of this Honorable Court <u>sealing</u> the above captioned indictment until the arrest of the last defendant in the above captioned case.

Respectfully submitted,

STEPHANIE A. FINLEY United States Attorney

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Assistant United States Attorney
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Lafayette, Louisiana 70501

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¹ Request that the existence of said indictments <u>only</u> be disclosed to defense attorney(s) whose client(s) have been arrested and are in custody and by means of a redacted indictments which blocks out names of all defendants not currently in custody.